

201-15157

Anh Nguyen

04/01/04 01:44 PM

To: NCIC HPV@EPA

cc:

Subject: Environmental Defense comments on Cyclopenta[g]-2-benzopyran,
1,3,4,6,7,8-hexahydro-4,6,6,7,8,8-hexamethyl (CAS# 1222-05-5)

----- Forwarded by Anh Nguyen/DC/USEPA/US on 04/01/2004 01:42 PM -----



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04/01/2004 01:13 PM

To: NCIC OPPT@EPA, ChemRTK HPV@EPA, Rtk Chem@EPA, Karen Boswell/DC/USEPA/US@EPA, Uma.Parasar@iff.com

cc: MTC@mchsi.com, kflorini@environmentaldefense.org, rdenison@environmentaldefense.org

Subject: Environmental Defense comments on Cyclopenta[g]-2-benzopyran,
1,3,4,6,7,8-hexahydro-4,6,6,7,8,8-hexamethyl (CAS# 1222-05-5)

(Submitted via Internet 4/1/04 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and Uma.Parasar@iff.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Cyclopenta[g]-2-benzopyran, 1,3,4,6,7,8-hexahydro-4,6,6,7,8,8-hexamethyl (CAS# 1222-05-5).

International Flavors & Fragrances, in response to EPA's High Production Challenge, has submitted Robust Summaries and a Test Plan describing available data and studies for Cyclopenta[g]-2-benzopyran, 1,3,4,6,7,8-hexahydro-4,6,6,7,8,8-hexamethyl (HHCB). Our review of this submission indicates the Test Plan and Robust Summaries are well-organized and concisely describe ample studies available to address the required SIDS elements for this chemical.

It is apparent that, likely because HHCB is commonly used in cosmetics and personal care products, it has been the subject of considerable study to assess its safety. It is encouraging to see that most of these studies have been published in the peer-reviewed literature and that references are provided in both the Test Plan and Robust Summaries. Thus, although some of these studies are older and were not conducted under GLP, they appear to be well designed and acceptable to address the respective SIDS elements. Other studies are more recent and were conducted under GLP. The only study that we question is the study described for reproductive toxicity, which we do not believe used a sufficiently high dose. However, given the lack of evidence of toxicity of HHCB, we do not consider these reproductive studies a major weakness in this submission and we would not recommend additional work in this area. This submission is complete and sufficiently thorough as is.

Thank you for this opportunity to comment.

Hazel B. Matthews, Ph.D.

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Richard Denison, Ph.D.

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